

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

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|-------------------------------|---|--------------------------------------|
| BOBBY COCHRAN, |) | |
| |) | |
| Plaintiff, |) | CIVIL ACTION NO. 3:10- CV-753 |
| |) | |
| v. |) | Judge Sharp |
| |) | |
| JP MORGAN CHASE, N.A., |) | Magistrate Judge Griffin |
| |) | |
| Defendant. |) | |

**JP MORGAN CHASE, N.A.'S MOTION FOR EXTENSION OF TIME TO RESPOND
TO DISCOVERY REQUESTS AND TO AMEND SCHEDULING ORDER**

Comes now Defendant JP Morgan Chase, N.A. ("Chase") by and through counsel, and respectfully moves for an extension of time to serve responses to written discovery requests (the "Discovery Requests") served on it by Plaintiff Bobby Cochran on August 30, 2011, and to amend the Court's scheduling Order as requested herein.

Plaintiff served Discovery Requests on Chase via mail on August 30, 2011. The Discovery Requests include Interrogatories under FRCP 33, and Document Requests under FRCP 34, and Requests for Admission under FRCP 36.¹ On September 2, 2011, Plaintiff had-delivered his responses to Chase's Interrogatories and Request for Production of Documents.

Due to the nature of the Discovery Requests and their lack of clarity, specifically the Interrogatories, and the need for additional time to research the file documents, Chase requests an additional 60 days to respond to the Discovery Requests, or until December 31, 2011. Plaintiff will not be prejudiced by the Court's allowance of additional time to respond and said

¹ The response due date for the Discovery Requests is October 3, 2011.

allowance would be fair given the previous extension given to Plaintiff (at Plaintiff's request) to respond to discovery requests propounded upon him by Chase on June 28, 2011.

Given its request for additional time to respond to discovery, Chase requests further relief from the Court regarding the scheduling Order [D.E. #42] and respectfully asks that the current discovery-related motion deadline of September 29, 2011, be amended to allow an additional thirty (30) days for any such motion, or until October 31, 2011; that the September 29, 2011, deadline for all discovery be extended to December 3, 2011; and that the dispositive motion deadline set for October 24, 2011, be reset for December 15, 2011.

Respectfully submitted,

_____/s/ D. Andrew Amonette
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Counsel for JP Morgan Chase, N.A.

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2011, a copy of the foregoing was filed in the above-captioned action. A copy of the foregoing will be sent by operation of the Court's electronic filing system to Bobby Cochran, 7176 Chester Road, Fairview, Tennessee 37062.

_____/s/ D. Andrew Amonette

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